MOTION FILED

APR 2 3 2003

No. 02-1429

In The
Supreme Court of the United States

DONNA SANTA MARIE, a fictitious name of a real individual, Individually, On Her Own Behalf, and on Behalf of All Women Similarly Situated, *et al.*,

Petitioners,

v.

JAMES E. MCGREEVEY, GOVERNOR OF NEW JERSEY, in His Official Capacity, *et al.*,

Respondents.

On Petition For A Writ Of Certiorari To The United States Court Of Appeals For The Third Circuit

MOTION FOR LEAVE TO FILE *AMICI CURIAE* BRIEF AND *AMICI CURIAE* BRIEF OF SANDRA CANO, THE FORMER "*DOE*" OF *DOE V. BOLTON*, NORMA MCCORVEY, THE FORMER "*ROE*" OF *ROE V. WADE* AND 751 POST-ABORTIVE WOMEN IN SUPPORT OF PETITIONERS

THE JUSTICE FOUNDATION
ALLAN E. PARKER, JR.
Counsel of Record
KATHLEEN CASSIDY GOODMAN
RICHARD CLAYTON TROTTER
8122 Datapoint, Suite 812
San Antonio, Texas 78229
(210) 614-7157
(210) 614-6656 facsimile
Attorneys for Amici Curiae

COCKLE LAW BRIEF PRINTING CO. (800) 225-6964
OR CALL COLLECT (402) 342-2831

70 PP

MOTION FOR LEAVE TO FILE *AMICI CURIAE* BRIEF OF SANDRA CANO, THE FORMER *"DOE"* OF *DOE V. BOLTON*, NORMA MCCORVEY, THE FORMER *"ROE"* OF *ROE V. WADE* AND 751 POST-ABORTIVE WOMEN IN SUPPORT OF PETITIONERS

Amici Curiae, Sandra Cano, the former *"Doe"* of *Doe v. Bolton*, Norma McCorvey, the former *"Roe"* of *Roe v. Wade* and 751 Post-Abortive Women, seek leave to file an *Amici Curiae* Brief in the above styled case for the reasons stated within this motion.

In Appendix 3 of the attached brief is a list of post-abortive women who have signed a document requesting that their names be listed as a Friend of the Court in support of the following statement:

> ***"It is not in the human or legal interest of any mother to kill her own child. A mother's true interest is in her child's life and her relationship with her child."***

Sandra Cano is the former *"Doe"* of *Doe v. Bolton*, 410 U.S. 179 (1973). Norma McCorvey is the former *"Roe"* of *Roe v. Wade*, 410 U.S. 113 (1973). These women, as the lead plaintiffs in the two cases that brought legalized abortion to America, have a unique perspective. The 751 post-abortive women have suffered, as Petitioners have, from the wrongful death of their children.

Amici's interest in this case is both significant and unique. The argument presented is not duplicative and is unavailable from any other source. *Ryan v. Commodity Future Trading Commission*, 125 F.3d 1062, 1062 (3rd Cir. 1997). Sandra Cano, Norma McCorvey, and 751 Post-Abortive Women seek to "provide a perspective that can

help the court beyond the help that the lawyers for the parties are able to provide." *See American College of Obstetricians and Gynecologists v. Richard Thornburgh*, 699 F.2d 644, 644 (3rd Cir. 1983).

Historically, the courts have been given discretion to allow the filing of *amicus curiae* briefs and have liberally granted such requests. *Northern Securities Company v. United States*, 191 U.S. 555 (1903). "More than three centuries ago [in 1686] it was stressed that 'the general attitude of the court was to welcome' *amicus* briefs because 'it is for the honor of a court of justice to avoid error.'" *American College of Obstetricians and Gynecologists v. Richard Thornburgh*, 699 F.2d 644, 647 (3rd Cir. 1983) (Higginbotham Jr., J. dissenting) (citing *The Protector v. Geering*, 145 Eng. Rep. 326 (K. B. 1686)).

In fact, the purpose of an *amicus curiae* brief is to "bring to the Court relevant matter not already brought to its attention by the parties [and] may be of considerable help to the Court." Sup. Ct. R. 37. Allowing these women to assist this Court will insure "a complete and plenary presentation of difficult issues so that the court may reach a proper decision." *United States v. Gotti*, 755 F. Supp. 1157, 1158 (E.D.N.Y. 1991). *Amici*'s insight is important in aiding the court's understanding of a critical legal issue. *See American Lung Ass'n v. Kean*, 670 F. Supp. 1285, 1287 (D.N.J. 1987) (granting *amicus curiae* submissions because the court wanted to hear such "insights" into the issues presented).

Amici are crucial in providing relevant information and unique insights into the legal issues of this case and to tell this Court about the tragedy many of them have endured. Who better to provide this Court with first-hand

information about women than the very ones whose cases brought legalized abortion to America. This Court has the opportunity to come to understand what the 751 Post-Abortive *Amici* know: The wrongful death of each woman's child through involuntary, coerced or deceived abortion is unjust and demands a remedy, not a cover-up.

STATEMENT OF CONSENT BY PARTIES

Counsel for *Amici* were unable to obtain consent from the Respondents to this suit. Mr. Patrick DeAlmeida, Deputy Attorney General, opposed. Mr. Andrew J. Schragger, Esq. and Mr. Rick Williams, Assistant County Counsel, Office of Mercer County Counsel, did not respond. Mr. Benjamin D. Leibowitz, Esq., Deputy County Counsel, Office of Middlesex County Counsel, could not provide a letter of consent. Mr. Frank Marasco, Assistant County Counsel & Chief of Claims, Office of Essex County Counsel did not respond. Petitioners do consent.

PRAYER

Amici pray this Honorable Court grant this motion and accept their *Amici Curiae* Brief for consideration in the above styled case. *Amici* further request that this Motion for Leave be set for oral argument, if necessary.

Respectfully submitted,

ALLAN E. PARKER, JR.
Texas State Bar No. 15505500
KATHLEEN CASSIDY GOODMAN
Texas State Bar No. 24000255
RICHARD CLAYTON TROTTER
Texas State Bar No. 20240500
THE JUSTICE FOUNDATION
8122 Datapoint, Suite 812
San Antonio, Texas 78229
Ph. (210) 614-7157
Facsimile (210) 614-6656
Attorneys for Amici Curiae, Sandra Cano, Norma McCorvey, and 751 Post-Abortive Women

TABLE OF CONTENTS

	Page
Table of Contents	i
Table of Authorities	iii
I. Interest of *Amicus Curiae*	1
A. Sandra Cano, The Former "*Doe*" Of *Doe v. Bolton*	1
B. Norma Mccorvey, The Former "*Roe*" Of *Roe v. Wade*	2
C. 751 Post-Abortive Women Whose Children Were Wrongfully Killed By Coerced, Involuntary, Or Deceptive Abortions	3
II. Summary Of Argument	5
A. Sandra Cano, The Former "*Doe*" Of *Doe v. Bolton*	5
B. Norma Mccorvey, The Former "*Roe*" Of *Roe v. Wade*	5
C. 751 Post-Abortive Women In Support Of Petitioners	6
III. Argument	7
A. Sandra Cano, The Former "*Doe*" Of *Doe v. Bolton*	7
1. The Actual Plaintiff In *Doe v. Bolton*, Sandra Cano, Is Uniquely Qualified To Show *Doe* Was Founded Upon Lies And Fraud	7

TABLE OF CONTENTS – Continued

Page

A. *Doe v. Bolton* Was Falsely Presented To The Supreme Court 7

B. Similar To Donna Santa Marie, Abortion Was The Choice Of Others And Not "Mary Doe's" Choice.. 9

2. Petitioners Have A Constitutional Right To Trial To Demonstrate That An Abortion Provider Has Abused The *Doe* "Health" Exception 12

3. Petitioners Have A Constitutional Right To Trial To Demonstrate That Some Abortion Providers In Practice Are Not Advocates Of Women's Health 14

4. Petitioners Have A Constitutional Right To Trial To Demonstrate That When Considering An Abortion They Were Especially Vulnerable To Coercion And Deception..... 15

B. Norma Mccorvey, The "*Roe*" Of *Roe v. Wade*..... 16

Jane Roe's Real "Choice" 16

C. 751 Post-Abortive Women In Support Of Petitioner 18

1. It Is Not In The Human Interest Of Any Mother To Kill Her Unborn Child 18

2. Petitioners' Experiences Are Not Unique 19

IV. Conclusion 20

TABLE OF AUTHORITIES

Page

CASES

Alexander v. Whitman, 144 F.3d 1392 (3rd Cir. 1997) 18

Davis v. Monroe County Bd. of Educ., 526 U.S. 629 (1999) 5

Doe v. Bolton, 410 U.S. 179 (1973) ..... *passim*

Donna Santa Marie v. Whitman, Civ. No. 99-2692 (GEB) (D. N.J. Nov. 28, 2001) (Order p. 21) 4

Holtzman v. Samuel, 130 Misc. 2d 976, 495 N.Y.S.2d 583 (1985) 13

M. L. B. v. S. L. J., 519 U.S. 102 (1996) 19

Moore v. City of East Cleveland, 431 U.S. 494 (1977) 18

Planned Parenthood v. Casey, 505 U.S. 833 (1992) 4

Polaroid Corp. v. Disney, 862 F.2d 987 (3rd Cir. 1988) 17

Roe v. Wade, 410 U.S. 113 (1973) ..... *passim*

Singleton v. Wulff, 428 U.S. 106 (1976) 4

Skinner v. State of Oklahoma, 316 U.S. 535 (1945) 11

Stenberg v. Carhart, 530 U.S. 914 (2000) 4, 19

Troxel v. Granville, 530 U.S. 57 (2000) 18

United States v. Vuitch, 402 U.S. 62 (1971) 9

Women's Med. Center v. Bell, 248 F.3d 411 (5th Cir. 2001) 18

I. INTEREST OF *AMICI CURIAE*[1]

A. Sandra Cano, The Former "*Doe*" Of *Doe v. Bolton*

Sandra Cano's[2] interests in filing as an *amicus curiae* are best understood in the context of *Doe* and the role her historic case played in the overall abortion rights context. *Doe v. Bolton*, 410 U.S. 179 (1973). In 1973, Mary Doe, serving as the named plaintiff, allegedly sought declaratory relief regarding the constitutionality of the Georgia criminal statutes involving abortion. *Id.* In the *Doe v. Bolton* case it was falsely asserted that Mary Doe came to the trial court on behalf of women seeking to have their reproductive rights expanded. (Cano Aff. ¶ 9 – Appendix 1). Cano believes that, similar to Donna Santa Marie, Petitioner, many women are coerced or deceived into believing false information regarding the nature and the consequences of abortion. Cano believes that it is critical for this Court to understand that her case in *Doe v. Bolton* was based on affidavits alone, rather than a fully-developed record, and it produced error which still plagues this country. Because injustice is more likely to occur the more the facts are hidden, Cano is desperate for this Court to avoid the same error – by ordering the lower court to see and hear evidence that was unavailable to the *Doe*

---

[1] No counsel for any party has written any part of this brief. No person other than Counsel for the *Amici*, the Texas Justice Foundation, has made a monetary contribution for the preparation or submission of this brief.

[2] Although technically "Mary Doe" was named Sandra Bensing at the filing of *Doe v. Bolton*, "Cano" was her name at the time that her participation in the *Doe* lawsuit became public. Because "Cano" is the name most people are familiar with, and for her own physical protection, Cano will be the name used throughout this brief.

Court. (Cano Aff. ¶ 19). Petitioners deserve a full trial rather than dismissal on the pleadings to avoid further injustice. Sandra Cano now knows that her case was not about her and what she wanted; instead, it was what the abortionists and others wanted, including this Court. (Cano Aff. ¶¶ 11, 16, 18). Sandra Cano has been forced to live with the consequences of this false compassion for too long. She begs this Court to allow Donna Santa Marie and the other Petitioners a trial on their claim that abortion is not truly in the interest of women. (Cano ¶ 18). In fact, the legalization of abortion in *Doe* began with a conspiracy of silence, manipulation and misrepresentation of a poor, uneducated woman. (Cano Aff. ¶¶ 11, 13). Too many women who lost their children through abortion have told Sandra Cano of their emptiness, their sadness, the void in their lives, and how others forced them to have abortions (like Donna Santa Marie) and then blamed the abortion on the mother. (Cano Aff. ¶¶ 12, 18). When their children are wrongfully killed, they deserve wrongful death compensation. Shouldn't the courts be willing to hear these cries? To consider and weigh the evidence? It is within this context of lies, coercion, and misinformation, and because of her unique role in the context of legalized abortion, that Sandra Cano offers argument on behalf of the Petitioners.

B. Norma Mccorvey, The Former "*Roe*" Of *Roe v. Wade*

Norma McCorvey, formerly designated as "Jane Roe" of *Roe v. Wade*, 410 U.S. 113 (1973), submits this brief in support of the Petitioners. She is the named class representative in the lawsuit responsible for the legalization of abortion in the United States. *Id.* Norma McCorvey's situation in *Roe* was very similar to the Jane Doe Plaintiff

herein. Norma has never experienced abortion, but thought she desired one. Norma McCorvey seeks, as a friend of the court, to alert this Court to avoid the error made by the courts below in incorrectly relying on *Roe* and its progeny to decide this case.

C. 751 Post-Abortive Women Whose Children Were Wrongfully Killed By Coerced, Involuntary, Or Deceptive Abortions

Amici are 751 women who have had abortions in the United States. *See* individual names and cities at Appendix 3. They want this Court to know that Petitioners are not alone in having been injured by coerced, involuntary, or deceptive abortions. After experiencing legal abortions created by *Roe v. Wade,* they are a mere fraction of the many post-abortive women across this Nation who agree with this statement:

> *It is not in the human or legal interest of any mother to kill her own child. A mother's true interest is in her child's life and her relationship with her child.*

They support Petitioners' claim for the wrongful death of their children. Children would admittedly be born alive if not for the tortfeasor's conduct. They wish to explain from a woman's perspective the preciousness of the mother-child relationship. All come together with diverse experiences, yet all agree with this most basic principle.

Aside from the early leading abortion cases, *Roe v. Wade,* 410 U.S. 113 (1973) and *Doe v. Bolton*, 410 U.S. 179 (1973), in subsequent abortion cases establishing abortion rights for women – the women are nowhere to be found. After *Roe* and *Doe*, the abortion doctors have claimed to

represent the interest of women, and the courts have allowed them to do so. *See, e.g., Stenberg v. Carhart*, 530 U.S. 914 (2000); *Planned Parenthood v. Casey*, 505 U.S. 833 (1992); *Singleton v. Wulff*, 428 U.S. 106 (1976). However, as the facts of *Donna Santa Marie* clearly illustrate, which must be taken as true in a Motion to Dismiss, their abortionists have hurt these women and do not represent the true interest of women.

In *Roe*, the Court envisioned that abortion doctors would protect women. *Roe*, 410 U.S. at 166. Sadly, the reverse has occurred, and instead of protecting women, *Roe* is being used as a shield by the abortionists against the women they injure. Under the protection of *Roe*, abortion doctors who hurt women are at liberty to do so without paying for the wrongful death they cause. Other wrongful death tortfeasors must pay, but not abortionists who kill in the womb. *Donna Santa Marie v. Whitman*, Civ. No. 99-2692 (GEB) (D. N.J. Nov. 28, 2001) (Order p. 21). As the women Petitioners in this case have come to know, the abortionists rely on *Roe's* "right to choose" to bar actions against themselves by claiming that it does not matter if the woman's choice was fatally uninformed, coerced, or involuntary. Plaintiff's First Amended Class Action Complaint at ¶ 24, *Donna Santa Marie v. Whitman* (D. N.J.) (Civ. No. 99-2692 (GEB)). The abortionists and the abortion industry neither represent Amici's interest nor the interest of countless women across this nation, and they can no longer claim to do so.

Amici are able to provide this Court a perspective unavailable from any other source. They ask this Court to grant Certiori and seek to assist this Court in understanding women's rights from the experience of post-abortive women, which is unique from previous abortion-related

cases. This would be the first time the Supreme Court has heard a case from women against the abortion industry.

II. SUMMARY OF ARGUMENT

A. Sandra Cano, The Former *"Doe"* Of *Doe v. Bolton*

As the direct result of Sandra Cano's case, *Doe*, *supra*, countless mothers have been unjustly denied their right to a relationship with their child. Abortion hurts women, such as the Petitioners, when they are either misled and lied to by abortion providers, or are coerced by others to wrongfully deny their relationship with their children. Sandra Cano, whose name and identity were improperly used to bring coercive abortions to the United States, would show the Court that young, poor, and uneducated women are easily victimized by those who view abortion as the solution, (Cano Aff. ¶¶ 12, 18) as Petitioners were in this case. It is time to allow a trial by jury on Petitioners' claim that legalized abortion, by its nature, is inherently too coercive toward women. (Cano Aff. ¶ 16). These alleged facts must be taken as true in an appeal from a Motion for Dismissal. *Davis v. Monroe County Board of Educ.*, 526 U.S. 629, 633 (1999).

B. Norma Mccorvey, The Former *Roe* Of *Roe v. Wade*

When *Roe* was decided, and in the subsequent abortion cases, the courts committed a grave oversight that is only now being brought to the attention of this Court; namely, a woman's right to be protected in her relationship with her child. McCorvey, Rose Acuna – "Jane Doe," and countless other women were not adequately informed

about the true nature and consequences of an abortion. McCorvey was deceived, but the courts since *Roe* also were deceived because of the lack of testimony and the lack of valid information presented to them. (McCorvey Aff. ¶ 3). Ultimately, these factual deficiencies led the Court to a faulty legal conclusion that abortion was a "right" when, in fact, abortion is the waiver of a right – a mother's right to her relationship with her child. (Pl.'s First Am. Class Action Compl., ¶ 28).

Based on her experience as the woman who brought legalized abortion to the United States, McCorvey urges this Court not to repeat the error committed by the courts in the *Roe* decision; namely, to decide life and death issues on an inadequate record. For thirty years, the doctrine of *Stare Decisis* has perpetuated the gross mis-characterization created in *Roe*: Abortion is not the right – abortion is the waiver of a woman's most precious right. This Court is being called to remedy the misconstruction of *Roe* and its progeny by the lower court, and to remand the case for a trial on the merits.

C. 751 Post-Abortive Women In Support Of Petitioners

Amici understand and appreciate the truth that a woman's most precious right is the right to her relationship with her child, and abortion is a waiver of that constitutional right. When viewed with this understanding, the waiver of that right should be fully protected and strictly construed.

III. ARGUMENT

A. Sandra Cano, The Former "*Doe*" Of *Doe v. Bolton*

1. The Actual Plaintiff In *Doe v. Bolton*, Sandra Cano, Is Uniquely Qualified To Show *Doe* Was Founded Upon Lies And Fraud

A. *Doe v. Bolton* Was Falsely Presented To The Supreme Court

The facts of Mary Doe's situation as presented to the United States Supreme Court were based upon false representations by her attorney. *Doe v. Bolton*, 410 U.S. 179 (1973), (Cano Aff. – Appendix 1). According to the *Doe* decision, the Supreme Court believed the following facts to be true regarding Sandra Cano, then called "Mary Doe". *Doe*, a twenty-two-year-old, married Georgia woman, was nine-weeks pregnant with three children. *Id.* 185. *Doe's* two older children had been placed in foster homes because of her poverty and inability to care for them, and the youngest had been placed for adoption. *Id.* Recently abandoned by her husband, she was forced to live with her indigent parents and their eight children. *Id.* Her history also included the fact that she previously had been a mental patient at the state hospital. *Id.* It was also alleged that when she was eight weeks pregnant, Doe applied to the Abortion Committee of Grady Memorial, Atlanta, for an abortion, but her application was denied. *Id.* According to interrogatories, Doe's application for an abortion was approved at a private hospital, but she could not pay for it. *Id.* Because her application was denied, she was forced either to relinquish "her right to decide when and how many children she will bear", *id.*, or to seek an illegal abortion.

The Supreme Court may have found these allegations compelling, but they were not true – Sandra Cano never wanted an abortion. (Cano Aff. ¶ 2). Yes, she had three other children who were no longer with her – one had been adopted and the other two were placed in foster homes. (Cano Aff. ¶¶ 13-14). But she wanted her children, she wanted her unborn child, and she actually ran away from her home in Georgia to avoid being forced into an abortion by her mother and her attorney. (Cano Aff. ¶ 5). These facts could have come to light in *Doe* if a full trial had been held rather than simply a hearing on summary judgment with affidavits. The lack of evidence was discussed by the Supreme Court at oral argument as follows:

> Q: Well, Mary Doe's real, isn't she?
>
> Mrs. Beasley: I don't know.
>
> Q: I thought it was conceded that she was.
>
> Mrs. Beasley: No, sir. We know no facts about her at all. We assume there is an affidavit concerning it, those facts may well be true; but we have had no opportunity to see whether there are other facts.
>
> . . .
>
> Mrs. Beasley: . . . So that no proof was submitted, no interrogatories were answered; we had no opportunity to find out.

Oral Argument, *Doe v. Bolton*, 410 U.S. 179 (1973). She urges the Court not to make the same mistake in this case and allow the abortion of a trial on the merits.

B. Similar To Donna Santa Marie, Abortion Was The Choice Of Others And Not "Mary Doe's" Choice

If the promise of *Roe v. Wade*, 410 U.S. 113 (1973) is true, abortion is supposed to be a woman's choice. But Donna Santa Marie, and countless mothers, are forced by others to have abortions. Sandra Cano ran away to avoid being forced into an abortion. (Cano Aff. ¶ 5). Her desire, like that of Donna Santa Marie in this case, was not to kill her baby. (Cano Aff. ¶ 4). Because of her lack of financial resources, she had been denied her relationships with her other children and was desperate not to lose her unborn child. (Cano Aff. ¶ 3). She went to an attorney for a divorce and to gain custody of her children, not an abortion. (Cano Aff. ¶ 3). Meanwhile, Cano's attorney was framing the justification for abortion to the courts in terms of "Mary's Doe's" desperation to have an abortion. *Doe,* 410 U.S. at 185, but "Mary Doe" was a deceptive legal fiction. Sandra Cano was young; she was poor, and she had limited education, but she never wanted an abortion. (Cano Aff. ¶ 2). Given these deceptively presented facts, in an affidavit that was never tested in the crucible of a trial, the Supreme Court concluded that "health" went beyond the health test set out in *United States v. Vuitch*, 402 U.S. 62 (1971).

Nevertheless, although the attorneys, physicians, nurses, clergymen, social workers, and the Court felt these factors were compelling enough for an exception to the *Roe* trimester approach, these factors did not compel the real woman, Sandra Cano, to want or to have an abortion. (Cano Aff. ¶ 3).

Cano's involvement in *Doe v. Bolton* has haunted her over the years. (Cano Aff. ¶ 10). While she, herself, never had an actual abortion, she knows what it is like to feel

responsible for an abortion – because the case bears her name. (Cano Aff. ¶ 10). She knows what it is like to feel like a mother, like Donna Santa Marie, who helped terminate the life of her own child. (Cano Aff. ¶ 12). After *Doe v. Bolton* was decided and Cano subsequently learned about her own involvement, she felt responsible for the tragic experiences to which the mother and babies were being subjected. (Cano Aff. ¶ 10). In a way, she felt as if she was involved in the abortions – responsible for the deaths of the children and the horrible experiences of their mothers. (Cano Aff. ¶ 10). She has experienced the feeling that the death of a child is her fault and experienced the helplessness a mother feels as events occur around her without any power to stop them, just as Donna Santa Marie suffered. (Cano Aff. ¶ 10). The guilt of causing the death of another innocent human being makes abortion unlike any other medical procedure in society. She feels the guilt that is associated with being told by the courts and society that the child's death was performed for the benefit of the mother and only the mother. (Cano Aff. ¶ 10).

As Donna Santa Marie's case shows, abortion is often coercion for a mother who cannot help herself, and is often done for others, not the mother. (Cano Aff. ¶ 16). Sandra Cano's own circumstances, the ones used to justify legal abortion back in the 1970s, are a perfect example of this reality. There were others, but Sandra Cano was the only pregnant mother who was a plaintiff. *Doe,* U.S. 410 at 184. All of these other people – the doctors and the others – were using the Court to do what they perceived as being in "Mary Doe's" interest. (Cano Aff. ¶ 11,12). They persuaded the Supreme Court that Sandra Cano needed the right to terminate the life of her own child. (Cano Aff. ¶ 11). But

aborting the child was their solution to her problem – it was not her's. (Cano Aff. ¶ 11). The doctors and the others claimed they did it out of compassion for her. (Cano Aff. ¶ 11). But it was a false compassion. (Cano Aff. ¶ 12). True compassion is not found in taking a woman's right to her child away from her. (Cano Aff. ¶ 12).[3] True compassion is not found in inducing a mother to take her child's life against her will. (Cano Aff. ¶ 12). True compassion is not found in failing to inform her about her child's humanity and only later for her to discover the reality, the tragedy, of what she has done. (Cano Aff. ¶ 18). True compassion does not leave her alone to bear the guilt and shame alone. (Cano App. ¶ 11).

Unfortunately, the legal right to an abortion was sought in Sandra Cano's case because others thought it was too hard for them to give her real help. (Cano Aff. ¶¶ 11, 12, 16). There was no real compassion. (Cano Aff. ¶¶ 11, 12, 16). The abortion was sought for them, not for her, as happened with Donna Santa Marie. (Cano Aff. ¶¶ 11, 12, 16). Coerced abortions should not be protected. They are a violation of a woman's liberty interest, *Roe v. Wade*, 410 U.S. 113 (1973), not an expansion of liberty. The court below perversely and incorrectly cites *Roe v. Wade, supra* for the proposition the State does not have to protect the mother's liberty to bear a child and make any consent informed and voluntary.

---

[3] The social solution of coerced, involuntary, or deceptive abortions for poor, uneducated pregnant women is just as heinous a social solution as forced sterilization, which was outlawed by the Supreme Court. *Skinner v. State of Oklahoma,* 316 U.S. 535 (1945).

2. Petitioners Have A Constitutional Right To Trial To Demonstrate That An Abortion Provider Has Abused The *Doe* "Health" Exception

The evidence in this case, if allowed to go to trial, will show that some abortion providers today have abused the *Doe* decision to the detriment of pregnant women such as the Petitioners. The Court in *Roe* assumed that the judicial and market factors that normally keep physicians' malpractice in check would be adequate in regulating abortion providers' use of "proper medical judgment", *Roe v. Wade*, 410 U.S. 113, 166 (1973). The Court stated:

> Up to those points, the abortion decision in all its aspects is inherently, and primarily, a medical decision, and basic responsibility for it must rest with the physician. If an individual practitioner abuses the privilege of exercising proper medical judgment, the usual remedies, judicial and intra-professional, are available.

Id. These expected protective forces did not function in the Petitioners' abortions. The lack of a wrongful death tort remedy insulates the abortionist and undermines the assumptions of *Roe v. Wade, id.*, resulting in a denial of equal protection. Because of the unique nature of abortion, neither market forces nor judicial remedies have worked in Petitioners' cases to curb the abuses of abortion providers, as the *Roe* Court thought they would. Abortion is a multimillion dollar business. (Pl.'s First Am. Class Action Compl., Affidavit of Carol Everett, p. 4 (stating that based upon her experience in the abortion industry, abortionists could potentially earn $6,000.00 per hour, and that she witnessed abortionists performing twelve abortions per hour).) Although clearly a profit-making assembly-line

business, abortionists in New Jersey are insulated by state law from wrongful death claims. Without wrongful death liability, the *Roe* Court's assumption of deterrence to bad conduct is gone.

The evidence at trial will show, and must be taken as true as alleged for purposes of this appeal, that these women continue to suffer physical injuries at the hands of those who profit from abortion, and it is the same coercive circumstances that brought them to the abortion facility that often keeps these pregnant women from filing suit or complaining to authorities. (Pl.'s First Am. Class Action Compl., Affidavit of Carol Everett). Frequently, women are ashamed and embarrassed that they are pregnant, and this embarrassment keeps them from reporting injuries and unsafe practices. Even when women are seriously injured or even killed, the cases rarely are pursued judicially. (*See* Carol Everett Affidavit, p. 5 (swearing that although she witnessed nineteen women being maimed and the death of one woman, no one ever filed suit against Everett's abortion facilities).) One of the rare cases, a New York case, that actually did make it to court, illustrates the abortionists' lack of concern for women and his real concern: profits. This abortion provider routinely told women they were pregnant and gave them abortions, even though their urine was never tested for proof of pregnancy. *Holtzman v. Samuel*, 130 Misc. 2d 976, 495 N.Y.S.2d 583, 588 (1985). The abortionist performed abortions on women who were not even pregnant. *Id.* Similarly, in the case before this Court, Petitioner Jane Jones' abortionist asserts that Jones had a right to choose abortion, but it did not matter that "the 'choice' was totally uninformed." (Pl.s' First Am. Class Action Compl. ¶ 24). Situations such as this illustrate that abortion providers are not true advocates of women's

rights or women's health, but tortious profit-seekers, insulated by the State of New Jersey from wrongful death liability.

3. Petitioners Have A Constitutional Right To Trial To Demonstrate That Abortion Providers In Practice Are Not Advocates Of Women's Health

The *Doe* Court made abortionists the determinative force in deciding whether an abortion is in the interest of a woman's health, and, now, it is these abortionists that have refused to enlighten women about the nature and health consequences of abortion, as the Petitioners' facts detail. (Pl.'s First Am. Class Action Compl. ¶¶ 23, 24, 27). As the assumed facts show, Petitioners were misled and lied to by abortion providers:

1. By failing to inform them of the physical, psychological and emotional consequences of abortion,

2. By failing to inform them that abortion is the taking of a human life, which is the permanent termination of the mother-child relationship,

3. By failing to inform them that the human being within them can feel pain, and

4. By failing to ensure that the decision to abort is totally voluntary and not the result of pressure or coercion.

(Pl.'s First Am. Class Action Compl. ¶¶ 23, 24, 27). Yet abortionists are protected by New Jersey law from damage actions for the wrongful death they cause, contrary to the assumption of *Roe v. Wade*.

Under the law of *Doe*, then, the abortionist, the one who financially benefits from abortion, is the one who determines whether abortion is in the woman's health interest. But in reality, the abortionist, the "protector of women", is the tortfeasor from whom women, like Petitioners in this suit, need to be protected. Instead, New Jersey, relying on *Roe* and the court below, misread *Roe*, and used it to say that there need be no wrongful death claim.

4. Petitioners Have A Constitutional Right To Trial To Demonstrate That When Considering An Abortion They Were Especially Vulnerable To Coercion And Deception

Since the natural human tendency of any mother is to protect her children, many women considering an abortion are in an unusually vulnerable situation. Coercion to have an abortion is particularly strong for women who are young, poor, uneducated, or abused, like Petitioners. Sandra Cano experienced this coercion. (Cano Aff. ¶¶ 2-6). Sandra Cano herself was pressured to have an abortion by others, but she ran away. (Cano Aff. ¶¶ 2, 5). Similarly, Donna Santa Marie was coerced by her parents. (Pl.'s First Am. Class Action Compl. ¶ 23). The father of the child may coerce a woman to undergo an abortion because he does not want to pay child support, even though it is his legal duty. An abortion provider seeking profits can be coercive. While the Court outlined many factors that implicate a woman's health in *Doe*, coercion by others was not considered by the Court. Coercion is a huge factor in the abortion context and is very destructive. (Pl.'s First Am. Class Action Compl., ¶¶ 32, 35, 36). The new evidence of coercion of pregnant women needs to be presented and heard by this Court.

B. Norma Mccorvey, The Former *Roe* Of *Roe v. Wade*

Jane Roe's Real "Choice"

While *Roe* stands for the proposition that women have liberty to "choose" regarding their bodies and reproductive capacity, in actuality, the truth in Petitioners' cases reveals a perversion of choice. True choice involves a meaningful decision based on knowledge and the availability of a range of options. A woman possesses the requisites for evaluating a decision in light of her own values only when equipped with such knowledge and options. If denied valid truthful information, a woman is lured into a false version of reality and, therefore, denied the opportunity to comprehend the true nature of her decision. McCorvey possessed neither full knowledge about the nature and consequences of abortion, nor was she given a range of options. Her so-called "choice" in deciding that she wanted to abort her baby consisted of two short sessions with the two female attorneys who represented her in *Roe v. Wade*, Sarah Weddington and Linda Coffee. (McCorvey Aff. ¶¶ 9-11, 13 – Appendix 2).

Being young and naive, McCorvey did not know the reality of the abortion procedure. (McCorvey Aff. ¶ 11). The term "abort" brought visions of John Wayne in a war movie saying, "Abort the mission!" (McCorvey Aff. ¶ 11). Following his command, all the planes then retreated to their base. (McCorvey Aff. ¶ 11). For McCorvey, then, "abortion" merely meant returning, going back to not being pregnant: a biological process reversed. (McCorvey Aff. ¶¶ 11, 14). Ultimately, the decision that legalized abortion in the United States was based on the affidavit of a woman who never read the affidavit before signing it, and her attorneys' erroneous explanation of abortion as the removal of a "missed period" and "just some tissue."

(McCorvey Aff. ¶ 11). If McCorvey had been cross-examined regarding her understanding of the true nature of abortion, her lack of informed consent would have been manifested to the court. In fact, by holding a trial, it would have become apparent to the court that valid information regarding the humanity of the child was necessary before any court decision could be reached. It is ironic that the case responsible for granting "choice" to women was based on McCorvey's unread affidavit and her misinformed belief about abortion. Similarly, the abortionist in this case told one of the Petitioners, Mary Doe, that she was "stupid" to think that the child was a human being. (Pl.'s First Am. Class Action Compl. ¶ 27). These and the many other factual allegations made by the Petitioners demonstrate the need for this court to remand the case to trial and not allow the trial court's blind misreading of *Roe* to usurp justice for women.

Roe is used by the abortion industry as a shield against those whom it was designed to protect. Donna Santa Marie and the other women are left victimized by not only the abortionists, but the law purporting to protect their rights. "This undermines the basis for *jus tertii* standing – that the *jus tertii* advocate will vigorously assert the interests of the right-holder." *Polaroid Corp. v. Disney*, 862 F.2d 987, 999 (3rd Cir. 1988). McCorvey, who later worked in abortion clinics, knows firsthand the industry's abuse of women. (McCorvey Aff., ¶¶ 17-23). Petitioners should be able to show that while abortion providers profess to represent the interest of women, the abortion providers can be the very parties responsible for taking away a woman's right to her relationship with her child. (Pl.'s First Am. Class Action Compl. ¶ 20).

Roe was used by the court below to protect the abortionist rather than the women. McCorvey's personal experience with abortion providers, and her experience as an abortion facility worker, substantiates the Petitioners' position that the abortion provider's interest can be in direct conflict with the interest of a woman. (McCorvey Aff. ¶¶ 9-11, 13, 15, 17-19, 23). *Roe* and *Doe,* as interpreted by the Third Circuit below, and the decision in *Alexander v. Whitman,* 144 F.3d 1392 (3rd Cir. 1997), are injurious to women.

C. 751 Post-Abortive Women In Support Of Petitioners

1. It Is Not In The Human Interest Of Any Mother To Kill Her Unborn Child

Petitioners have asserted a woman's rights case which exemplifies that abortion takes away the joy of motherhood and replaces it with grief. *See Women's Med. Center v. Bell*, 248 F.3d 411, 418 (5th Cir. 2001) (referring to testimony of witness that "abortion is almost always a negative experience for the patient . . . "). The New Jersey law, protecting abortionists from wrongful death claims, has created an incredible distortion of the rights women cherish. A woman's oldest and most fundamental right is the right to her relationship with her child – not the death of her child. *See Troxel v. Granville*, 530 U.S. 57, 88 (2000) (referring to fundamental liberty interests in preserving familial bonds between parents and children). This Court is now asked by Amici to enforce the Constitutional protection of the sanctity of the family and equal protection that is deeply rooted in this Nation's history. *Moore v. City of East Cleveland*, 431 U.S. 494, 503 (1977). "[T]he interest of parents in their relationship with their children is sufficiently fundamental to come within the finite class of

liberty interests protected by the Fourteenth Amendment." *M. L. B. v. S. L. J.*, 519 U.S. 102, 119 (1996).

2. Petitioners' Experiences Are Not Unique

The names and addresses of 751 post-abortive Amici demonstrate that deceptive, involuntary or coerced abortions occur all over the United States. *See* Appendix 3. It is important for the Court to take this case to protect women nationwide.

Amici want this Court to know that Petitioners' experiences are not unique. Women are often not told about the horrible nature or the gruesomeness of the procedure when getting an abortion, but they may later learn of it. For example, in differentiating a D&E abortion from a partial-birth abortion, Justice Kennedy describes abortion: "In a D&E, portions of the fetus are pulled into the vagina with the intention of dismembering the fetus by using the traction at the opening between the uterus and vagina. This cannot be considered a delivery of a portion of a fetus. In Dr. Carhart's own words, the D&E leaves the abortionist with a 'tray full of pieces,' at the end of the procedure." *Stenberg v. Carhart*, 530 U.S. 914, 974-75 (Kennedy J. dissenting) (internal citations omitted). A woman later realizing what she has done is likely to suffer severe psychological trauma, as Petitioner Mary Doe alleges. The women who have lost their children are then forced to suffer the pain that follows the loss of a child and bear the responsibility, all alone. As this case below so aptly illustrates, misinterpreting *Roe* protects only those in the abortion industry – those who wrongfully took Donna Santa Marie's child's life, and those who wrongfully took the lives of the children of the other women Petitioners.

Instead of denying equal protection, this Court should provide authentic legal protection to women.

IV. CONCLUSION

Women know that abortion is the waiver of a woman's most precious right; namely, her fundamental right to her relationship with her child. Donna Santa Marie, and the other women Petitioners, have been denied their rights, not only by the abortionists who took their children, but by the decision in the courts below. Justice requires that these women and all women be protected from those who take their children from them either by force or deceit, as happened to the Plaintiffs. *Amici Curiae* pray this Court recognize the very basic traditional right of a woman to her relationship with her child, overrule the lower court's decision, and allow this case to proceed to trial.

Respectfully submitted,

ALLAN E. PARKER, JR.
Texas State Bar No. 15505500
KATHLEEN CASSIDY GOODMAN
Texas State Bar No. 24000255
RICHARD CLAYTON TROTTER
Texas State Bar No. 20240500
THE JUSTICE FOUNDATION
8122 Datapoint, Suite 812
San Antonio, Texas 78229
Ph. (210) 614-7157
Facsimile (210) 614-6656
Attorneys for Amici Curiae, Sandra Cano, Norma McCorvey, and 751 Post-Abortive Women

APPENDIX 1

UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

Alan Parker, Esq.
8122 Datapoint, Suite 812
San Antonio, Texas 78229
(210) 614-7157
AEP/0301
Attorneys for Amicus

Anne O'Connor, Esq.
509 Stillwells Corner Rd.
Freehold, NJ 07728
(732) 303-0440
AJO/4721
Local Counsel

DONNA SANTA MARIE, et al.
Plaintiffs

vs.

CHRISTINE TODD WHITMAN, et al.
Defendants

Civil Action No. 99-2692 (GEB)

AFFIDAVIT OF SANDRA CANO-SAUCEDO IN SUPPORT OF MOTION FOR LEAVE TO FILE AN AMICUS CURIAE BRIEF

Sandra Cano-Saucedo, being of full age deposes and says:

1. My name is Sandra Cano-Saucedo. I live in Georgia where I have resided for virtually my entire life. I am the woman who was designated as Mary Doe, the plaintiff *Doe v. Bolton*, 410 U.S. 179 (1973), the case reported in the official reports of the United States Supreme Court as the companion case to *Roe v. Wade*, 410 U.S. 113 (1973). At the time of the decision in *Doe v. Bolton*, my real name was Sandra Race Bensing. As the plaintiff in *Doe v. Bolton*, I have a very substantial interest in the litigation before this court in the matter of *Santa Marie v. Whitman* and I can provide the court a unique perspective of the *Doe*

v. Bolton case not available from any other source. I can also provide a unique insight and abortion providers and those who promote abortion as a "solution" to a mother's circumstance and the interest of pregnant women such as myself.

2. In 1970, when *Doe v. Bolton*, began, I never sought an abortion and I never wanted an abortion. People around me wanted me to have an abortion but I refused.

3. In 1970, I was pregnant with my fourth child when I went to a legal aid attorney to obtain legal assistance in my struggle to obtain custody of my ~~three~~ [two] children and a divorce from my husband who failed to properly discharge his duties to all four of my children, including the baby I was carrying at that time. The lawyer who was assigned to me was Margie Pitts Hames. One afternoon, my mother and my lawyer told me that my suitcase was packed to go to a hospital. They informed me that they had scheduled an abortion at a hospital for the next day. I was advised that my doctor, Dr. Donald Block, was going to perform an abortion. I was twenty-two years old. I told both my mother and my lawyer that I would not have an abortion. Not then. Not ever. They persisted in their demands upon me. My husband was not supporting my children and me. I had to live at the Salvation Army. At times I lived with my mother, but my stepfather (who married my mother after my dad passed away) didn't want us there. My predicament made it difficult for me to take care of my children, but I didn't need an abortion. I needed help, but all of the people around me, – my husband, my mother and my lawyer – refused to help me with my children. I carried my child to full term and gave birth. Because no one would help me I felt compelled to surrender my rights and give my baby up for adoption.

4. Instead of real help, my mother, stepfather and my lawyer persisted in their demands that I have an abortion. Those demands were made for themselves so they wouldn't be burdened. It was, in my mind, a demand for what they thought was the easiest way for them to get out from under any obligation to help my new baby and me. But the abortion was not in my interest. I was the mother of a baby for whom I was responsible. I had a natural desire to have my baby and to raise her.

5. When the demand for an abortion persisted, I fled to Oklahoma and stayed at the home of my ex-husband's grandmother. I remained in Oklahoma until my mother and lawyer assured me that they would cease their pressuring me to have an abortion. I was relieved that the ordeal was ended. Because they promised never to force me to have an abortion, I returned to Georgia.

6. My lawyer, Margie, sent me a plane ticket so I could fly from Oklahoma to Georgia. She wanted me to be in a courtroom with other pregnant mothers. The night before I went to court, my mother and my lawyer expressed concern that I would leave again, and so they had me stay at the apartment of a legal-aid lawyer. Before the court appearance I was told by my lawyer not to say anything in court. As a result, I never did say anything in court.

7. One day in 1973, my mother and stepfather called me into their bedroom. Their television was on. They shouted to me excitedly. "Look! You won! You won!" I saw my lawyer, Margie, on television. The story reported on television was that the United States Supreme Court had made abortion legal. I did not fully comprehend what my role was in the Court's decision in *Doe v. Bolton*.

8. Over the years I gained a greater and greater sense that I was wrongfully used in *Doe v. Bolton*. A number of years ago I decided that I wanted to see my file in that case so I could see what was said about me. I went to the court house to see my records. I understood they were under seal. An attorney, Wendell Bird, agreed to represent me and he asked that my records in the case be unsealed. I produced my driver's license, my birth certificate, and my marriage certificate. The attorney who represented me in *Doe v. Bolton*, Margie Pitts Hames, tried to stop me from getting my own records, and I didn't understand why.

9. When I first saw the opened records in *Doe v. Bolton*, I understood why Margie didn't want me to see them. The records stated that I applied for an abortion, was turned down, and, as a result, sued the state of Georgia. According to the records, I had applied for an abortion through a panel of nine doctors and nurses at Grady Memorial Hospital, a state-funded hospital. That was a false statement. After reading this in the court records, I contacted the hospital and tried to obtain my records. At first I was told there were records, but when my new attorney sent his legal assistant to review the records, we were told that they didn't exist. The hospital said they didn't have any records. There are no records whatsoever of me applying for or planning an abortion at Georgia Baptist Hospital. I never sought an abortion there or anywhere else.

10. I have often rethought how my involvement in *Doe v. Bolton* came about. Over the years it has haunted me. I, myself, never had an actual abortion. But I know what it is like to feel responsible for one. I know what it is like to feel like a mother who helped terminate the life of her own child. After *Doe v. Bolton* was decided and I was told about my involvement, I

felt responsible for the experiences to which the mothers and babies were being subjected. In a way, I felt that I was involved in the abortions – that I was somehow responsible for the lives of the children and the horrible experiences of their mothers. I have felt that experience. The experience that the death of a child is my fault; the helplessness the mother feels as events occur around her without any power to stop them; and the guilt that is associated with being told by the courts and society that the child's death was performed for the mother and only the mother.

11. This last assertion – that abortion is performed for the mother – is the cruelest misrepresentation of all. My own circumstance, the one used to justify legal abortion in the first place, is a perfect example of this reality. There were many doctors, and clinics and others who were plaintiffs in *Doe v. Bolton*. As Mary Doe, I was the only pregnant mother who was a plaintiff. All of these other people – the doctors, nurses and clinics were using the Court to do what they thought was in my interest. They pressured the Court claiming I need the right to terminate the life of my own child. It was their solution, not mine. They claimed they did it out of compassion for me. But it was a false compassion. A true compassion would result in the fathers living up to their responsibilities. A true compassion, once a mother is in the predicament that the child's father abandoned her, would advise her how to get help and would provide her help. Unfortunately, the legal right to an abortion was sought in my case because others thought it was too hard for them to give me real help. The abortion was sought for them, not for me.

12. I have been forced to live with the consequence of this false compassion for too long for me not to support Donna Santa Marie and bring to the attention of the Court the fact that abortion is not in a woman's

interest, and the fact that legalization of abortion began with manipulations and misrepresentations. Too many women who lost their children through abortion have told me of their emptiness, their sadness, the void in their lives, and how others forced them to have abortions and then blamed the abortion on the mother. The experience of *Doe v. Bolton* must be understood and accounted for, not simply to correct the record in my own case, but to correct the public record in the *Santa Marie* case and the law of abortion in general; abortion is not in the interest of a mother. It is a false solution imposed upon her by others.

13. At times, I have been forced to reflect upon the events that led up to that day in 1973 when my mother and stepfather told me about the Supreme Court decision in *Doe v. Bolton*. In 1970, my life was a mess. I was having my fourth child, but no responsible husband or real place to live. I was uneducated. When I came back from Oklahoma, I was so relieved that no one was going to pressure me to have an abortion I took part in a court proceeding without understanding what was really happening. I was used wrongly, but I didn't inquire enough. In retrospect, there were big signs which revealed what was happening. Once a television man came to Margie's office and I was asked what I thought of abortion. I told him that "I don't believe in abortion and I don't want an abortion." I also said I didn't care if anyone else had an abortion, that it wasn't my business. All I cared about, at that time, was that I didn't want an abortion. I wasn't thinking of the other women. I did not understand that I was involved in a case that sought to legalize abortion. I was naïve. In retrospect, perhaps, I could have discovered what was going on. But I was in a crisis. I depended on my mother's help. My lawyer became upset with me because I would never say to anyone that I would have

an abortion. I should have, perhaps, understood what was happening, but I was simply attempting to survive. I remember Margie debating me. She claimed it was a liberation right we were involved in. She said women were entitled to equal pay for equal work and I agreed. I never saw the pleading filed in court.

14. Many years later, when I saw the unsealed records in my case, I couldn't believe what the certification filed in my name said. I am certain the signature on the affidavit that said I wanted an abortion, was not mine. I never saw that affidavit until the records were unsealed. If it was my signature, it was obtained without my knowing the contents of the affidavit. I had fled to Oklahoma to avoid an abortion. My lawyer knew I would never say I wanted one. The only reason I went to a lawyer was to get my children back. I and my predicament was used to argue that my new baby's life should be terminated.

15. This is the first time that I have appeared in a lawsuit to address *Doe v. Bolton* and how my circumstance was misused. It is not the first time I have publicly stated that I never wanted an abortion and that *Doe v. Bolton* was a fraud upon the court. I stated that publicly before. In fact, after I publicly stated that *Doe v. Bolton* was a fraud and it should be undone, someone drove by our house and fired shots at it.

16. This is the first time I have been able to submit an affidavit in court and speak for myself. *Doe v. Bolton* was a secret case about abortion, which is a secret procedure. This secretiveness allows others to prevail upon the mother and others can act against her interest. ~~Too many~~ [W]omen have told me how they were forced to have an abortion against their will. If it was alleged that I spoke for other women in *Doe v. Bolton*, then I gladly speak for other women in this

case to say that abortion is too coercive by nature; too much the will of others; too much the will of a society which finds abortion more convenient for it than a commitment to the well being of the mother and the child.

17. The real experiences of the women must be known to and taken into consideration by the court. Abortion is too much what others would like a woman to do, rather than what is in her interest and what she really wants.

18. I was nothing but a symbol in *Doe v. Bolton*. My experience was discounted. It was misrepresented. Abortion is just like *Doe v. Bolton*. It discounts the real experiences of the mothers. It misrepresents that it is for them. I can tell the court about all of the heart breaking stories women have told me about abortions they had. The court should take time to learn about them. I could relate the pain of these mothers, how they were lied to and how they were coerced, but I understand that it would be improper in an affidavit of this type. I now urge the court to examine the true experiences of the mothers to get to the truth that abortion is not in their interest.

19. Others told the court that I wanted and [sic] abortion. The law has developed, in part, based upon what my lawyer claimed I thought, what I wanted, and that abortion was in my interest. I feel I have the duty to tell this court the truth about what I really thought then, and what I think now. I was in a very difficult position in 1970. In many ways my life was unstable. But no matter how hard life happens to be, no one has the right to kill a baby – especially the baby's mother. She is the trustee of her child's life. She, of all people, has the sacred duty to protect the child. But the child's interests are not at odds with her own. They are in concert with one another. The

mother derives a great benefit from her relationship with her child. It is as beneficial to her as it is the child. It is never in the interest of a mother to terminate the life of her own child.

20. Now I ask that the court let me file a friend of the court brief in support of the legal positions of Donna Santa Marie and the other plaintiffs. I can argue to the court through and with the help of my lawyers the legal reasons why the facts I speak of are important to the legal determinations in the *Santa Marie* case.

/s/ Sandra Sauceda
Sandra Cano-Sauceda
A.k.a. Mary Doe of *Doe v. Bolton*

Sworn to and subscribed before me this the 15 day of March, 2000.

/s/ Gwendlyn D. Bowman
Notary Public

APPENDIX 2

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

TEXAS JUSTICE FOUNDATION
8122 Datapoint, Suite 812
San Antonio, Texas 78229
(210) 614-7157
AEP/0301
Attorneys for Amicus Curiae
Norma McCorvey

Anne O'Connor, Esq.
509 Stillwell Corner Rd.
Freehold, NJ 07728
(732) 303-0440
AK/4721
Local Counsel for
Norma McCorvey

DONNA SANTA MARIE, et al.
Plaintiffs

vs.

CHRISTINE TODD WHITMAN, et al
Defendants.

Civil Action No.
99-2692 (GEB)

Affidavit of Norma McCorvey Motion for Leave to File an Amicus Curiae

---

Norma McCorvey, being of full age deposes and says:

1. "My name is Norma McCorvey, and I reside in Dallas, Texas. I was the woman designated as "Jane Roe" as plaintiff in *Roe v. Wade*, the United States Supreme Court decision that legalized abortion in the United States. On January 22, 1973, the U.S. Supreme Court declared that it was unconstitutional for my state to prohibit doctors from performing abortions.

2. Because of my role in *Roe v. Wade*, how that decision came about, and my experiences working at abortion clinics, I can provide the Court with information and a perspective unavailable from other sources. I have a compelling interest in this litigation. My case was wrongfully

decided and has caused great harm to the women and children of our nation. I have an interest in stopping that harm and I have an interest in disclosing the facts which expose the weakness of the underlying assumptions which led to that incorrect decision.

3. Virtually the entire basis for *Roe v. Wade* was build[t /s/ N. Mc] upon false assumptions. No meaningful trial to determine the real facts was ever held. The misrepresentations and deceptions that plagued *Roe v. Wade* are presented to this Court to show why there is a dire necessity for a trial to ensure that the true facts regarding the nature of abortion and the interests of women are heard. These facts, which were neither disclosed to me in 1970 nor to the plaintiffs of this case before they had an abortion, are critical for understanding the issues involved. They point out the deficiencies not only of the procedure in *Roe v. Wade*, but in the Court's decision which was rendered in a vacuum devoid of findings of facts. Consequently, we obtained a decision in *Roe v. Wade* based upon what abortion advocates wanted women to be able to do, not what women were truly capable of. In this case, the witnesses and accurate, current, relevant scientific evidence are available to this Court, on all relevant fact issues. In 1973, in *Roe,* that evidence was neither offered nor available. We now have the benefit of twenty-seven years of experimentation. Such absence of evidence led to both a factually and legally unsound decision.

4. While the experience of being Jane Roe over the past twenty seven years has been very difficult, my life has been filled with hardship from the beginning. Although I was an emotionally abused child, and a sexually abused teenager, I believe the worst abuse was inflicted by the *Roe* case. In retrospect, I was exploited by two self-interested

attorneys. Worse, I feel the courts, without looking into my true circumstances and taking the time to decide the real impact abortion would have upon women, used me to justify legalization of terminating the lives of over thirty-five million babies. Although on an intellectual level I know I was exploited, the responsibility I feel for this tragedy is overwhelming. Because the courts allowed my case to proceed without my testimony, without ever explaining to me the reality of abortion, without being cross-examined on my erroneous perception of what of [sic] abortion really is, a tragic mistake was made by the courts, a mistake that this Court has the opportunity to remedy.

5. Prior to my pregnancy with the "Roe" baby, I gave birth to two other children. My first, a daughter, was adopted by my mother. It is difficult to part with [my /s/ N. Mc] child, yet I have always been comforted by the fact that my daughter is alive and cared for. My second daughter was raised by her father, a young intern at Baylor Methodist Medical School. He was kind enough to want to get married and make a home, but I wasn't ready for that kind of commitment. Later, when I became pregnant with the "Roe" baby, I was really in a predicament. My mother expressed her disapproval of my having given birth out of wedlock. She told me how irresponsible I had been. My mother made it clear that she was not going to take care of another baby.

6. Certain that I was pregnant, I waited for a while before I went to the doctor. While I was waiting to be examined, I questioned the ladies there about whether they knew where a woman could go to have an abortion. A lady told me where an illegal clinic was located and told me that it would cost $250.00. Following our discussion, I told the doctor that I wanted to have an abortion, but he

refused stating that abortion was illegal. He didn't believe in abortion and gave me the phone number of an adoption attorney.

7. When I had saved about two hundred dollars, I took a cross-town bus to the illegal clinic, which turned out to be a dentist's office that had been closed down the previous week. For some reason, I felt relieved yet angry at the same time. All my emotions were peaking; first, I was angry, then I was happy, and then I'd cry. From the abortion clinic, I took the bus to my dad's apartment and decided to speak with the adoption attorney. The adoption attorney set up the meeting and referred me to Sarah Weddington, the attorney who represented me in *Roe v. Wade*.

8. Although Weddington and I were about the same age, our lives were quite different. She was a young attorney, and I was homeless and lived in a park. Unconcerned about politics, I sold flowers and an underground newspaper describing the types and availability of illegal narcotics. I am not proud of my jobs. At the time I sought simply to survive.

9. Following the adoption attorney's introduction, Weddington invited me out to dinner. I agreed. At our initial meeting, I met with Sarah Weddington and Linda Coffee, her friend. Both Weddington and Coffee had recently finished law school and they wanted to bring a class action suits [sic] against the State of Texas to legalize abortion[, not nationally /s/ N. Mc]. We discussed the case over a few pitchers of beer and pizza at a small restaurant in Dallas. Weddington, Coffee, and I were drinking beer and trying to come up with a pseudonym for me. I had heard that whenever women were having illegal abortions, they

wouldn't carry any identification with them. An unidentifiable woman was often referred to as Jane Doe. So we were trying to come up with something that would rhyme with "Doe". After three or four pitchers of beer, we started with the letter "a" and eventually we reached "r" and agreed on "Roe". Then I asked "What about Jane for the first name?" Janie used to be my imaginary friend as a child. I told them about her and how she always wanted to do good things for people, and it was decided – I became Jane Roe[, by the stroke of a pen. /s/ N. Mc].

10. The young lawyers told me that they had spoken with two or three other women about being in the case, but they didn't fit their criteria. Although I did know what "criteria" meant, I asked them if I had what it is that it took to be in their suit. They said yes, "You're white. You're young, pregnant, and you want an abortion." At that time, I didn't know their full intent. Only that they wanted to make abortion legal and they thought I'd be a good plaintiff. I came for the food, and they led me to believe that they could help me get an abortion.

11. During our meeting, they questioned me, "Norma don't you think that abortion should be legal?" Unsure, I responded that I did not know. In fact, I did not know what the term "abortion" really meant. Back in 1970, no one discussed abortion. It was taboo, and so too was the subject of abortion. The only thing I knew about the word was in the context of war movies. I had heard the word "abort" when John Wayne was flying his plane and ordered the others to "Abort the mission." I knew "abort" meant that they were "going back". "Abortion", to me, meant "going back" to the condition of not being pregnant. I never looked the word up in the dictionary until after I had already signed the affidavit. I was very naive. For

their part, my lawyers lied to me about the nature of abortion. Weddington convinced me that "It's just a piece of tissue. You just missed your period." I didn't know during the *Roe v. Wade* case that during an abortion the life of a human being was terminated.

12. After our meeting, I ~~returned home~~ [went /s/ N. Mc] to my father's ~~house~~ [apartment /s/ N. Mc] and began to drink alcohol heavily. I was depressed with my plight in life. I tried to drown my troubles in alcohol. Shortly thereafter I even attempted suicide by slitting my wrists. When my father questioned me about what was troubling me, I responded that I was pregnant again. When he asked me what I was going to do, I responded that I was thinking about having an abortion. He inquired, "What is that?" I said, "I don't know. I haven't looked it up yet."

13. Shortly thereafter, Weddington and Coffee presented the affidavit for my signature at Coffee's office. I told them that I trusted them and that I did not need to read the affidavit before I signed it. I never read the affidavit before signing it and do not, to this very day, know what is written in the affidavit. Both Weddington and Coffee were aware that I did not read the affidavit before I signed it. At no time did they tell me that I had to read it before they accepted my signature. I told them that I trusted them. We called ourselves "the three musketeers." I know now that is one place where I went wrong. I should have sat down and I should have read the affidavit. I may not have understood everything in the affidavit and I would have probably signed it anyway. I trusted the lawyers.

14. My lawyers never discussed what an abortion is, other than to make the misrepresentation that "it's only tissue". I never understood that the child was already in

existence. I never understood that the child was a complete separate human being. I was under the false impression that abortion somehow reversed the process and prevented the child from coming into existence. In the two to three years during the case no one, including my lawyers, told me that an abortion is actually terminating the life of an actual human being. The courts never took any testimony about this and I heard nothing which shed light on what abortion really was.

15. In 1972, Sarah Weddington argued in the courts, presumably on my behalf, that women should be allowed to obtain a legal abortion. The courts did not ask whether I knew what I was asking for. The abortion decision that destroyed every state law protecting the rights of women and their unborn babies was based on a fundamental misrepresentation. I had never read the affidavit and I did not know what an abortion was. My lawyers and the other supporters of abortion used my circumstance to urge the courts to legalize abortion without any meaningful trial which addressed the humanity of the baby, and what abortion would do to women. At that time, I was a street person, I lived, worked, and panhandled out on the streets. My totally powerless circumstance made it easy for me to be used. My presence in the court was a necessary evil. My real interests were never anyone's concern.

16. As the class action plaintiff in the most controversial U.S. Supreme Court case of the twentieth century, I only met with the attorneys twice. Once over pizza and beer, when I was told that my baby was only "tissue". The other time at Coffee's office to sign the affidavit. There were no other personal contacts. I was never invited into court. I never testified. I was never present before any court on any level, and I was never at any hearing on my case. The

entire case was an abstraction. The facts about abortion were never heard. Totally excluded from every aspect and every issue of the case, I found out about the decision from the newspaper just like the rest of the country. In a way my exclusion, and the exclusion of real meaningful findings of fact in *Roe v. Wade*, is symbolic of the way the women of the nation and their experiences with abortion have been ignored in a national debate by the abortion industry. It is what the abortion industry thinks is good for women which is presented. Not the reality of the mothers' experiences.

17. Later in life I was confronted with the reality of *Roe v. Wade*. My personal involvement in *Roe v. Wade* was not my only experience with abortion. Unskilled and uneducated, with alcohol and drug problems, finding and holding a job was always a problem for me. But with my notoriety, abortion facilities, usually paying a dollar an hour more than minimum wage, were always willing to add Jane Roe to their ranks. My medical training as a respiratory therapist at Baylor University was my only medical training, but I always could work at an abortion facility. Always in control, I could either make the women [sic] stay or help her leave. My duties were similar to those of a [LPVN /s/ N. Mc] or and [sic] RN, such as taking patients' blood pressure and pulse and administering oxygen, although I never recorded any statistics or temperatures. Basically, I would stand inside the procedure room, hold the women's hands, and say things to distract them by saying, "What is the most exciting, or happiest period of your life?" Meanwhile, the abortionist was performing what is represented as a "painless" procedure and the women were digging their nails into me in an effort to endure the pain.

18. I worked in several abortion facilities over the years. In fact, I even worked at two clinics at the same time, and they were all the same with respect to the condition of the facilities and the "counseling" the women receive. One clinic where I worked in 1995 was typical: Light fixtures and plaster falling from the ceiling; rat droppings over the sinks; back up sinks; and blood splattered on the walls. But the most distressing room in the facility was the "parts room". Aborted babies were stored here. There were dead babies and baby parts stacked ~~high~~ [like cordwood. /s/ N. Mc]. Some of the babies made it into buckets and others did not, and because of its disgusting features, no one ever cleaned the room. The stench was horrible. Plastic bags full of baby parts that were swimming in blood were tied up, stored in the room and picked up once a week. At another clinic, the dead babies were kept in a big freezer full of dozens of jars, all full of baby parts, little tiny hands and feet visible through the jars, frozen in blood. The abortion clinic's personnel always referred to these dismembered babies as "tissue." Veterinary clinics I have seen are cleaner and more regulated than the abortion clinics I worked in.

19. While all the facilities were much the same, the abortion doctors in the various clinics where I worked were very representative of abortionists in general. The abortionists I knew were usually of foreign descent with the perception that the lax abortion laws in the United States present a fertile money-making opportunity. One abortionist, in particular, would ~~always~~ [sometimes /s/ N. Mc] operate bare-chested, [and sometimes barefoot /s/ N. Mc] with his shirt off, and earned a six figure income. He did not have to worry about his bedside manner, learning to speak English, or building a clientele.

20. While the manners of the abortionists and the uncleanliness of the facilities greatly shocked me, the lack of counseling provided the women was perhaps the greatest tragedy. Early in my abortion career, it became evident that the "counselors" and the abortionists were there for only one reason – to sell abortions. The extent of the abortionists' counseling was, "Do you want an abortion? Ok, you sign here and we will give you an abortion." Then he would direct me, "You go get me another one." There was nothing more. There was never an explanation of the procedure. No one even explained to the mother that the child already existed and the life of a human was being terminated. No one ever explained that there were options to abortion, that financial help was available, or that the child was unique and irreplaceable. No one ever explained that there was [sic] psychological and physical risks of harm to the mother. There was never time for the mother to reflect or to consult with anyone who could offer her help or an alternative. There was no informed consent. In my opinion, the only thing the abortion doctors and clinics cared about was making money. None of the abortion clinics I worked at cared about the women involved. As far as I could tell, every woman was the nameless, faceless Jane Roe.

21. Typically, most of the women would cry as soon as the suction machine was shut off[, or, at some point /s/ N. Mc]. Sometimes I thought that they realized what had been done to their babies. Once, I heard a woman call her mother and say, "I just killed my baby. I'm so glad you never killed me!"

22. The doctors always hid the truth from the mothers. I would say about eighty-percent of the women would try to look down during the abortion and try to see what was

happening. The doctors would start with the scalpel; there was just blood and torn up "tissue" for the women to see. Specifically, I remember one woman who came in for an abortion, a pretty, sweet young woman about eighteen years old, [with a teddy bear.] During the procedure she looked down and saw the baby's hand fall into the doctor's hand. She gasped and passed out. When she awoke and asked about what she saw, I lied to her and told her it didn't happen. But she insisted that she had seen part of her baby. A few weeks later, when she returned for her follow-up exam, she was a changed person: her sweetness had died and had been replaced with an undescribable hardness. I could not look her in the eye. It took quite a few beers that night to make that particular day go away.

23. In all of the clinics I worked in the employees were forbidden to say anything that could talk the mother out of an abortion. The experience of abortion began to take its toll on me. While the abortionists' counseling was non-existent, my counseling technique gradually became different depending on my mood and the stage of my career. In later years, I would sometimes take all the instruments that were used in an abortion procedure and purposely leave a little of the blood on some [sic] the instruments. Laying the instrument out on the little table in front of the woman, I would tell her that, "This is the first instrument that is going to be inserted into your vaginal area." It would have just had a little smudge of blood, and I thought it was very dramatic. In retrospect, I don't even know why I was doing these things. It was as if I was trying to talk these women out of the abortion – something we were forbidden to do. In other counseling sessions, I would demonstrate the position and warn her that the instruments were sharp, and that if she moved the doctor

might slip, puncture her uterus, and she would bleed to death. In other situations, when a woman asked me how much it cost, I asked her in response how much she wanted to pay to kill her baby. She replied, "They told me it wasn't a baby." I responded, "What do you think it is inside you, a fish?" Other times I would comfort them after the abortion by saying, "It wasn't a baby. It was only a missed period." Sometimes when I managed to make the women unsure, I would offer to refund their money except for the ultrasound.

24. I openly advocated legalized abortion for many years following *Roe v. Wade*. But working in the abortion clinics forced me to accept what abortion is. It is a violent act which kills human beings and destroys the peace and the real interests of the mothers involved. This court must do what was not done in *Roe v. Wade*. It must have a trial and make findings of fact based upon real evidence. Abortion must be publicly defined. The humanity of the child must be determined. The exploitation of the women must be looked at. The health risks must be examined. The abusive practices of the abortion industry must be weighed and the mothers' real interests must be considered.

25. After I saw all the deception going on in the abortion facilities, and after all the things that my supervisors told me to tell the women, I became very angry. I saw women being lied to, openly, and I was part of it. There's no telling how many children I helped kill while their mothers dug their nails into me and listened to my warning, "Whatever you do, don't move!" I can assure the court that I never observed that the interest of these mothers was a concern of abortion providers.

26. Because I was drunk or stoned much of the time, I was able to continue this work for a long time, probably much longer than most clinic workers. It is a high turnover job, because of the true nature of the business. The abortion business is an inherently dehumanizing one. A person has to let her heart and soul die or go numb to stay in practice. The clinic workers suffer, the women suffer, and the babies die.

27. I respectfully request that this court allow me to act as a friend of the court as this court decides the question presented, including the question of whether it is a violation of the mother's rights if they can't sue the doctors who performed involuntary or uniformed [sic] abortions.

/s/ Norma McCorvey
Norma McCorvey
A.k.a. Jane Roe of *Roe v. Wade*

Sworn to and subscribed before me this the 15 day of March, 2000.

/s/ Gwendlyn D. Bowman
Notary Public

LIST OF INDIVIDUALS SUBMITTING THIS FRIEND OF THE COURT BRIEF

Docket No. 02-1429 ~ *Donna Santa Marie, etc., et al., Petitioners v. James E. McGreevey, Governor of New Jersey, et al.*

I. Individual women and mothers acting as Amici who have had abortions listed with their true names, cities and states of residence.

Shari Lynn Abney ~ Yuba City, CA
Barbara Adams ~ San Antonio, TX
LaVeta Adams ~ Arkansas City, KS
Holly R. Adams ~ Wylie, TX
Mary Adams ~ Wichita Falls, TX
Jo Anne Adkinson ~ Huntertown, IN
Kathleen Anderson ~ Sioux City, IA
Nancy Anderson (George) ~ Cherokee, IA
Christina G. Ange ~ Hackberry, LA
Laurie Aper ~ Midland, TX
Marilyn E. Aponte ~ Bartonsville, PA
Cherylyn Arroyo ~ Hammond, IN
Carol Arthaloney ~ Baton Rouge, LA
Julie Atkinson ~ Plymouth, MN
Donna A. Augustine ~ Jacksonville, FL
Susan Lea Babcock ~ Castle Rock, CO
Cindy Bacon ~ Gonzales, LA
Kimberly Bagley ~ Marysville, CA
Linda Indgjer Baird ~ Athens, AL
Marci Baity ~ Harrisburg, PA
Terri Baker ~ Houston, TX
Cathleen Baldwin ~ Elizabeth, NJ
Juanita Baldwin ~ Sylmar, CA
Judith G. Ballas ~ Springfield, PA
Mary Bangs ~ Fort Worth, TX
Damaris Baral ~ Yuba City, CA
Nancy Barber ~ Lewistown, MT

Lisa Barger ~ Helotes, TX
Sharon Barnard ~ Costa Mesa, CA
Catherine C. Barnella ~ Mesa, AZ
Constance Barnes ~ San Antonio, TX
Jennifer Barrett ~ Temple, GA
Lynda Bartling (Vanderlee) ~ Frankfort, IL
Shirley Beattie ~ Margate, FL
Tereza Becica ~ Van Nuys, CA
Tamela J Beckman ~ Appleton, WI
Cari Lynn Behan ~ Jefferson, GA
Amy M. Bemboom ~ St. Cloud, MN
Lisa L. Bernardo ~ Los Gatos, CA
Debra Betancourt ~ Somerset, NJ
Margaret M. Beverley ~ Bound Brook, NJ
Loretta Bingham ~ Port St. Lucie, FL
Brenda C. Black ~ Advance, NC
Connie Blackford ~ Marysville, CA
Elizabeth Ann Bogusz ~ Charlotte, MI
Deborah Sue Bond ~ Kunkletown, PA
Theresa Bonopartis ~ Harrison, NY
Lisa Bornstein ~ Manville, NJ
Bernadette Bowles ~ St. Petersburg, FL
Tammy Branaman ~ Yuba City, CA
LarRaine Branch ~ Chester, PA
Lisa Brashears ~ Fort Smith, AR
Maureen Brett ~ Roslyn, PA
Jane F. Briggs ~ San Antonio, TX
DeAnn Brindley ~ LaRue, TX
Victoria Brinkerhoff ~ South Amboy, NJ
Julie S. Brown ~ La Grange, IN
Regina Brown ~ Marysville, CA
Donna M. Brown ~ Scotrun, PA
Donna L. Brown ~ Murrieta, CA
Suzanne W. Brown ~ Lancaster, SC
Katrina L. Brummette ~ Carmel, IN
Cynthia Brunk ~ Hood River, OR
Patricia R. Burke ~ Dallas, PA
Amy Rene Burns ~ Camden, AR

Lynn Marie Burns-Reed ~ Scottsdale, AZ
Judy Burtleson ~ Yuba City, CA
Lacy Cain ~ Spring Branch, TX
Barbara Camacho ~ Houston, TX
Patricia Camargo ~ Hillsborough, NJ
Mary Ann Camp ~ Evans (Augusta), GA
Elizabeth Campbell ~ Vacaville, CA
Dena Campie ~ Eldridge, IA
Danielle Capozzi ~ Franklin Lakes, NJ
Kyra Carbone ~ Massapequa Park, NY
Debra J. Cardullo ~ East Greenwich, RI
Doris Cardwell ~ Elon, NC
Angela Carroll ~ Ft. Lauderdale, FL
Rebekah Carter ~ Memphis, TN
Virginia Casey ~ Rio Rancho, NM
Nilda V. Cazella ~ Carteret, NJ
Alicia Ceballos ~ Garland, TX
Donna M. Celenza-Sweet ~ Prescott, AZ
Mary Cerny ~ Mountain, WI
Robin Chamberlain ~ Oak Park, IL
Angie Chevallier ~ Raleigh, NC
Amy M. Childers ~ Benicia, CA
Monica Chiralo ~ Centreville, VA
Robin Rene Clark ~ Yuba City, CA
Carley Clark ~ Yuba City, CA
Sandra Clark-Macias ~ San Antonio, TX
Glossie Clements ~ Rockford, IL
Velma M. Coleman ~ Baltimore, MD
A. Michelle Colombero ~ Bridgewater, NJ
Natalie M. Comas ~ Baltimore, MD
Linda Conger ~ Marysville, CA
Judith L. Cook ~ Riverside, CA
Nicole W. Cooley ~ Fort Knox, KY
Shannon Cooper ~ Bellville, TX
Theresa R. Corey ~ Yuba City, CA
Kristi Cottrill ~ North Fort Myers, FL
Kristin M. Couture ~ Martinez, GA
Mary Ann Cox ~ Jacksonville, FL

Angie D. Craft ~ Gainesville, GA
Anne J. Criscitiello ~ Somerville, NJ
Darlene Crumbo ~ Vacaville, CA
Elida Cruz ~ San Antonio, TX
Toi Culpepper ~ Olympiafields, IL
Julie Culpepper ~ Carrollton, GA
June M. Culver ~ Mims, FL
Eileen Curley ~ Bernardsville, NJ
Barbara Curry ~ Bellingham, WA
Patricia L. Curtis ~ Spicewood, TX
Kathleen Czarnecki ~ Erie, PA
Theresa M. Dando ~ Glendale, AZ
Gretchen B. Daniels ~ Santa Rosa, CA
Pauletta Davis ~ Green Cove Spgs., FL
Elena J. Davis ~ Converse, TX
Anna Dawson ~ Lake Forest, IL
Maureen De La Vega ~ Canyon Country, CA
Sharon DeAndrea ~ Pittsburgh, PA
Tracy D. Dearing ~ Spokane, WA
Barbara DeLoach ~ Rio Rancho, NM
Lisa Delyria ~ Mesa, AZ
Wendy DeMercer ~ Gainesville, GA
Carole Denton ~ Topeka, KS
Susan Diehl ~ Martin, TN
Sandra Diggs ~ Marysville, CA
Ramona C. DiLauro ~ Westfield, NJ
Angel Dillard ~ Valley Center, KS
Jeanne DiMaggio ~ Rutherford, NJ
Barbara Dirrim ~ Alpharetta, GA
Robin Docherty Yarborough ~ Chesapeake, VA
Shawn Doctor ~ San Antonio, TX
Anita Dost ~ Rock Hill, SC
Sharon L. Dotson ~ Virginia Beach, VA
Jackie Doucette ~ Largo, FL
Mary Elizabeth Dove ~ Marietta, GA
Deborah L. Dowless ~ Vinton, VA
Cassie Downs ~ Houston, TX
Janice N. Doyle ~ McHenry, IL

Linda Drum ~ San Antonio, TX
Rebecca A. Dryhurst ~ Ravenna, OH
Mary J. Duncan ~ Aiken, SC
Jacquelyn K. Dunnam ~ Point Clear, AL
Leslie L. Dupy ~ Springfield, MO
Melissa Edinger ~ Bartonsville, PA
Maureen Edmond ~ San Diego, CA
Lana Edwards ~ Hunt, TX
Darlene Elliot ~ Martinez, GA
Debbie S. Ellison ~ Midland, TX
Jeanette Elwell-Cossin ~ Grove City, OH
Carolyn S. Everett ~ Shamrock, TX
Sharon C. Fahey ~ Summerville, SC
Ann Marie Fava ~ Brooksville, FL
Mimi Finesilver ~ Montgomery, AL
Debra A. Flaig ~ Croyden, PA
Yvonne Florczak-Seeman ~ Clarendon Hills, IL
Sabrina R. Flower-Wucinich ~ Glendale, AZ
Laurie C. Fontana ~ Houston, TX
Georgette Forney ~ Sewickley, PA
Patrice S. Forsyth ~ Highland Village, TX
Carol A. Foster ~ Bourbonnais, IL
Teressa Freeman ~ Baltimore, MD
Barbara Ann Frey ~ Culpepper, VA
Linda F. Fuqua ~ Clute, TX
Cynthia Jean Gafford ~ Cumming, GA
Barbara Garcia ~ Marysville, CA
Jackie L. Garner ~ Durant, OK
Amy E. Garrison ~ San Antonio, TX
Linda Gartman ~ Aledo, TX
Lisa Gilligan ~ Woodbridge, NJ
Susan N. Gliko ~ Deer Lodge, MT
Rae C. Goerlach ~ Ridley Park, PA
Maryanne Gonzalez ~ No. Plainfield, NJ
Sonya G. Goodrich ~ Portland, OR
Kelly A. Gough ~ White Plains, NY
Rebecca C. Gowin ~ Yuba City, CA
Marisa Graham ~ Yuba City, CA

Maria Grande ~ Matawan, NJ
Gwen E. Gregory ~ Winston-Salem, NC
Sandra K. Griffin ~ Carrollton, GA
Mary Griswold ~ Danvers, IL
Mary A. Groves ~ Boyertown, PA
Meghan Grubb ~ Fort Worth, TX
Veronica Guthrie ~ Joliet, IL
Carol Guzzone ~ East Windsor, NJ
Nancy M. Haberling ~ Cols, OH
Susan Haderthauer ~ Iselin, NJ
Kathy Ann Hahn ~ Tahlequah, OK
Lisa M. Hal ~ Port Allen, LA
Mary Ellen Hale ~ Mtn. Home, ID
Rebecca Ann Halks ~ San Antonio, TX
Thelma Katherine Hall ~ Moody, TX
Claire Hall ~ Gulf Shores, AL
Jennifer Hall ~ Westminster, CA
Katharine Halsey ~ Wilson, WY
Q. Esther Hamilton ~ Atglen, PA
Carolyn Hardy ~ Tuttle, OK
Toni Harger ~ Marysville, CA
Lori Harrington ~ Houston, MS
Sandra Harris ~ Freeport, TX
Ethel Louise Harris ~ Wichita, KS
Diane Harrison ~ Crossville, TN
Nancy Hart Hernandez ~ San Antonio, TX
Karen Ruth Hartman ~ Wickenburg, AZ
Anne Hartnett ~ Mabank, TX
Janet Hasak ~ Paradise, CA
Dawn Hasegawa ~ Yuba City, CA
Lisa M. Heacock ~ Milwaukie, OR
Helena Hebbeler ~ Annandale, NJ
Shannon Heer ~ Ventura, CA
Debbie Hegge ~ Lebanon, OR
Marie Elizabeth Hendrikson ~ Mosinee, WI
Jennifer G. Hennes ~ Jackson, WI
Patricia Henry ~ Forest Park, GA
Victoria L. Henry ~ Salisbury, MD

Dianne L. Hensley ~ Alvin, TX
Stacey P. Herrin ~ Rome, GA
Theresa J. Herzog ~ Jupiter, FL
Deborah J. Hess ~ Pottsboro, TX
Karen Hoffner ~ Saylorsburg, PA
Christina (NMI) Hogan ~ Goetzville, MI
Karen Holmes ~ Arlington, TX
Edrena B. Horne ~ Detroit, MI
Lori Howard ~ Lakewood, NJ
Laura Howard ~ Columbus, OH
Jill A. Huber ~ Wilmington, DE
Carol Hudson Ramsaur ~ Marietta, GA
Debbie Hughes ~ Riverside, CA
Donna G. Hurst ~ Aloha, OR
Cinthya Hutmacher ~ San Antonio, TX
Mary Hutson ~ Brainerd, MN
Marlene Hylak ~ Downers Grove, IL
Jody Ilisco ~ Woodbury Hgts., NJ
DeeDee Ireland ~ Alvin, TX
Connie M. Irving ~ Tacoma, WA
Elizabeth Marshall Jabush ~ Jackson, NJ
Denise Jackson ~ Forest Park, IL
Donna Jalkanen ~ Palm Harbor, FL
Ellen C. Jennings ~ Warwick, RI
Tonia Johnson ~ Morton, IL
Karyn Johnson ~ League City, TX
Rhonda T. Johnson ~ W. Chicago, IL
Betty A. Johnson ~ Manteca, CA
Kellye Johnson ~ Dixon, CA
Trudy M. Johnson ~ Colorado Springs, CO
Marsha D Johnston ~ Jacksonville, AR
Debbie Jones ~ Midland, TX
Gwen M. Jones ~ Santa Clarita, CA
Joanne L. Jordan ~ N. Richland Hills, TX
Anna Colleen Jordan ~ Spring, TX
Kimberly L. Joyce ~ San Antonio, TX
Denise Judd ~ Imperial, MO
Laurie A. Kari ~ Wasill, AK

Christine Kasper ~ San Antonio, TX
Susan Kaul ~ St. Louis, MO
Dianne Keeton ~ San Antonio, TX
Kristen M. Kelly ~ Monument, CO
Sharon Kelly ~ Woodstock, IL
Beverly A. King (Cook) ~ Prosper, TX
LeAnn Kirrmann ~ Grand Ledge, MI
Marene M. Kissinger ~ Cordelia, CA
Kathryn R. Kline ~ Athens (Greece)
Noemi O. Klipfel ~ Hudson, MI
Bobbi L. Kloss ~ San Antonio, TX
Dayna L. Knappick ~ Atascosa, TX
Jennifer Kneese ~ San Antonio, TX
Debra Knox ~ Kendall Park, NJ
Lisa Marie Koenig ~ Rockton, IL
Lisa Kostas ~ Marysville, CA
Stacie L. Krogull ~ Rockford, IL
Tiffany Ann Kruse Pierce ~ San Antonio, TX
Nena Lynn Kubon ~ Crown Point, IN
Maura E. La Piana ~ Wurtsboro, NY
Sonya Lacy ~ Upper Darby, PA
Jeanne Larivee ~ Elkins, AR
Claudia Larsen ~ Rutledge, PA
Rebecca L. Lauderdale ~ Fort Wayne, IN
Joy M. Lavelle ~ East Otto, NY
Shari Lawler ~ Terra Alta, WV
Ruth M. Leach ~ Coppell, TX
Jill Lee ~ Sutter, CA
Michelle Lee ~ San Antonio, TX
Jennifer Lee ~ Tecumseh, MI
Wanda J. Lester ~ Galesburg, MI
Nancy Lincoln ~ DeWitt, IA
Patricia Liquefatto ~ Westminster, MD
Rhonda A. Livingston ~ St. Louis, MO
Renee L. Lobrano ~ Augusta, GA
Debbie Locander ~ San Antonio, TX
Stephanie Renee Locklair ~ Charlotte, NC
Stefanie Loughman ~ Newark, OH

Kristy Loye ~ Denton, TX
Karla Maddox ~ Denham Springs, LA
Rain Mahan ~ Redding, CA
Lisa D. Maher ~ Woodbridge, VA
Lorraine Manning ~ Marysville, CA
Carol S. Margetts ~ N. Plainfield, NJ
Brenda Sue C. Marino ~ Plaquemine, LA
Marlena Markwell ~ Bardstown, KY
Tiffany Matos ~ Bridgeport, CT
Paula Maurer ~ Flushing, MI
Edith Mauro ~ Rensselaer, NY
Karen S. Maxton ~ Wichita, KS
Holly J. Maxwell ~ Lebanon, IN
Kitty McClane ~ Midland, TX
Heather McCormack ~ Stockbridge, GA
Janice McCullins ~ Chicago, IL
Michelle J. McTeague ~ Nashville, TN
Laura Mele ~ Somerville, NJ
Rebecca Merchberger ~ Dublin, VA
Roxanne Mergenthaler ~ Kalispell, MT
Alana Merha ~ Dayton, OH
Susanne Meyer ~ North Palm Beach, FL
Julie Millhorn ~ Pompano Beach, FL
Cynthia L. Minarik ~ Ogden, UT
Elisa M. Mohammed ~ Shawnee-On-Delaware, PA
Maria A. Monteiro ~ Rahway, NJ
Vicky V. Moon ~ Hollywood, FL
Susan B. Moore ~ Philadelphia, PA
Michele R. Moore ~ Yuba City, CA
Nanette Moreau ~ Leesburg, VA
Pat Morris ~ Blue Island, IL
Laura Morris ~ Yuba City, CA
Shelley Magee Motz ~ New Braunfels, TX
Paula Mueller-Farris ~ Annandale, NJ
Katherine M. Muir ~ Media, PA
Linda Kay Mullen ~ Pensacola, FL
Debbie Mullen ~ Jamestown, NY
Theresa K. Bowlick Mund ~ Wharton, TX

Kathleen Murz ~ Houston, TX
Leslie D. Musick ~ Memphis, TN
Diane K. Musselman ~ Lancaster, PA
Leah S. Mustill ~ Pagosa Springs, CO
Julie Muzzy ~ Columbia City, IN
Myra J. Myers ~ Flower Mound, TX
Amber Nanni ~ Saraland, AL
Sharon Nanos ~ Hondo, TX
Carrine Narey ~ Plant City, FL
Darla Nash ~ Corinth, MS
Chelita Neal ~ San Antonio, TX
Joyce A. Nesbit ~ Eldorado, AR
Melissa W. Newbern ~ Carrollton, GA
Lesia Newell ~ Locust Grove, GA
Becky K. Nhan ~ Tomball, TX
Shelley Brooks Nicholson ~ Houston, TX
Debra Nicolosi ~ Wanaque, NJ
Gina M. Noel ~ Dubuque, IA
Beth A. Novina ~ Portage, IN
Rita O'Brien ~ Somerville, NJ
Carol O'Donnell ~ Long Beach, CA
Janice O'Donnell ~ Manville, NJ
Jodi Oakley ~ Yuba City, CA
Kari Oakley ~ Cumming, GA
Melissa Obrecht ~ Portola Hills, CA
Misty Oliver ~ Olivehurst, CA
Peggy J. Orr ~ North Platte, NE
Pamela Anne Owens ~ Abington, PA
Cathy Palmer ~ Pensacola, FL
Molly Palomino ~ Marlborough, CT
Te Andra Parker ~ Radcliff, KY
Paula R. Parris ~ Colorado Springs, CO
Judy Pastor ~ Baton Rouge, LA
Michelle Payton ~ San Antonio, TX
Sherrill Perez ~ San Antonio, TX
Bolleska Perez ~ Bernardsville, NJ
Mary J. Perrin ~ Edgewood, WA
Aida Peterman ~ Burkburnett, TX

Keyia M. Peterson ~ Denison, TX
Susan Phelan ~ Somerset, NJ
Wanda S. Phillips ~ Richmond Hill, GA
Pamela D. Pigott ~ Tylertown, MS
Mary Susan Pine ~ West Palm Beach, FL
Kristie Pitre ~ Denham Springs, LA
Karen A. Pitzel ~ Plantation, FL
Twyla Powers ~ Somerville, NJ
Lori Praydich ~ Eatontown, NJ
Lesa Preece ~ Lampasas, TX
Melissa Pressley ~ Cumming, GA
Sandra Prior ~ St. Petersburg, FL
Bonnie Pucciariello ~ Marysville, CA
Patricia Pulliam ~ Rockport, TX
Sue Ellen Raby ~ Corte Madera, CA
Karen Radke ~ Sun Prairie, WI
Stacey Ratcliff ~ Baton Rouge, LA
Janice Rathkey ~ Portland, OR
Annette L. Ravinsky-Fleeger ~ Philadelphia, PA
Rexene Redd ~ Selma, AL
Janice Lea Redmond-Huffman ~ Mission, KS
Rayna Lu Reimer ~ Brenham, TX
Kimberly Revels ~ Centralia, MO
Constance Rice ~ Santa Clarita, CA
Anne Rene Richmond ~ Grantsville, UT
Christine Riffel ~ Big Sandy, MT
Lori L. Riggs ~ Riverside, CA
Tiffani L. Ritt ~ Machesney Park, IL
Melissa Robinson ~ Glendale, AZ
Dorothy Rogers ~ San Antonio, TX
Tommie Romano ~ Skokie, IL
Vanessa Roulett ~ Somerset, NJ
Kimberlee Ruszkiewicz ~ Muskego, WI
Agnes Salamon ~ Bridgewater, NJ
Melanie J. Sanchez ~ Marysville, CA
Pamela Sanders ~ Sparta, TN
Jill Schneider ~ San Antonio, TX
Michelle Schwartz ~ Cape Coral, FL

Lisa Schwartz ~ Columbiana, OH
Sierra Secaur ~ Van Wert, OH
Toni Seiple ~ Griffin, PA
Amy Seltzer ~ Newnan, GA
Suella Shaner ~ Garden Ridge, TX
Angela M. Shatzer ~ Kings Mountain, NC
Jennifer Shell ~ Humble, TX
Tina T. Shopher ~ Como, TN
Juanita Inez Shotts Flowers ~ Dowling, MI
Linda Sigel ~ San Antonio, TX
Rita Sigler ~ Chattanooga, TN
Lawrie J. Sikkema ~ Columbia, SC
Brenda L. Sizemore ~ Gig Harbor, WA
Jolene K. Skuse ~ Yucca Valley, CA
Jacqui Sloan ~ Gonzales, LA
Nancy J. Smith ~ LaPorte, IN
Donna M. Smith ~ Gonzales, LA
Allyson Smith ~ El Cajon, CA
Susan C. Smuck ~ Swarthmore, PA
Debbie Snyder ~ Byhalia, MS
Jennifer Sperle ~ Wichita, KS
Rosalie Stadelman ~ Great Meadows, NJ
Scherrie Stanley ~ Oak Grove, MO
Angela Stanton ~ Philadelphia, PA
Dorothy P. Stathis ~ Deerfield Beach, FL
Charlotte Steill ~ Mesa, AZ
Frances E. Stewart ~ Whittier, CA
Catherine "Cathy" G. Stewart ~ New Braunfels, TX
Michelle L. Stewart ~ Wichita, KS
Julie L. Stone ~ Adel, GA
Carmen Stone ~ Carteret, NJ
Janelle Stratton ~ Corvallis, OR
Carla Stream ~ Hudson, WI
Shari Stromgren ~ Brooklyn Park, MN
Judy Sullivan ~ Staten Island, NY
Kathleen Summers ~ Bloomsbury, NJ
Christine A. Suriano ~ Schenectady, NY
Kathy L. Swift ~ Elizabeth, NJ

Kathleen J. Talka ~ Pittstown, NJ
Carol B. Talley ~ Richmond, VA
Dorothy C. Tate ~ Lawrenceville, GA
Sally H. Taylor ~ Laplata, MD
Moira Templeton ~ Buford, GA
Donna M. Thompson ~ Portland, OR
Cheryl Timothy ~ Yuba City, CA
Kimberly Tobey ~ Houston, TX
Terra Todd ~ Billings, MT
Stephanie Tomaszewski ~ Kunkeltown, PA
Jessica Torres ~ Boca Raton, FL
Monique Trahan ~ Baton Rouge, LA
Wanda Treider ~ Almo, KY
Louisa A. Trevino ~ Dallas, TX
Joanne Marie Troup ~ Wallingford, PA
Teri Tufford ~ Yuba City, CA
Audrey M. Turco ~ Gig Harbor, WA
Elizabeth E. Turnage ~ Cleveland, OH
Mitzi M. Turpin ~ Collierville, TX
Lisa Marie Vance ~ North East, MD
Judith A. VanderMark ~ St. Louis, MO
Dana Vandiver ~ Lula, GA
Debra Vick ~ Augusta, GA
Audra L. Villarreal ~ Prosser, WA
Carmen Vrzal ~ San Antonio, TX
Marie Wagenaar ~ Middletown, DE
Marie Wagner ~ Edison, NJ
Derrilynne D. Waldau ~ San Antonio, TX
Denise Walker ~ Brooklyn Center, IN
Mary Beth Walsh ~ McDonough, GA
Helen L. Warmack ~ San Antonio, TX
Sheila R. Watkinson ~ Earlysville, VA
Katey Weaver ~ Terre Haute, IN
Connie L. Webb ~ San Antonio, TX
Carolyn Weedin ~ Dallas, TX
Tiki R. West ~ Sealy, TX
Linda Whaley ~ Baltimore, MD

Terri White ~ Beloit, WI
Caroline F. Wienecke ~ San Antonio, TX
Robin Willegal ~ Montello, WI
Ruth Williams ~ Bedford, TX
Laura Willing ~ Quincy, IL
Cindy Wilson ~ Salinas, CA
Michelle S. Winkler ~ Jackson, MS
Colleen Wolters ~ Phillipsburg, NJ
Sandra Woodley ~ Midlothian, TX
Constance J. Woodruff ~ Pulaski, VA
Konnie S. Woods ~ Newport, TN
Deborah Worrell ~ Martin, TN
Lisa Worthen Woody ~ Spruce Pine, NC
Tammy Worthington ~ North Wales, PA
Jo A. Yancey ~ Shreveport, LA
Patricia W. Yancy ~ Houston, TX
Rachel Yard ~ North Hills, CA
Corniece Young ~ Joliet, IL
Sarabelle Young ~ Ontario, OR
Connie Marie Young Peterson ~ Vacaville, CA
Andrea Zapczynski ~ Bensalem, PA
Stephanie C. Zentgraf ~ Medford, NY
Monica Zimmer ~ Bridgewater, NJ

II. Individual women and mothers acting as Amici who have had abortions listed only by their initials, cities and states of residence.

M.A. ~ Ridge, NY
M.A. ~ Watchung, NJ
C.A. ~ LaPorte, IN
C.A. ~ Hackettstown, NJ
K.A. ~ Martinez, GA
F.A. ~ Evansville, WI
M.A. ~ Silverton, OR
T.B. ~ Hackettstown, NJ
N.B. ~ Phoenix, AZ
L.B. ~ Yuba City, CA

L.B. ~ Puyallup, WA
P.B. ~ Horseshoe Bend, AR
C.B. ~ Fairfield, CA
Y.B. ~ San Diego, CA
S.B. ~ Palm Harbor, FL
E.B. ~ Woodbridge, NJ
S.B. ~ Richmond, VA
K.B. ~ Overland Park, KS
K.B. ~ Port Orchard, WA
R.B. ~ Irving, TX
P.B. ~ Richardson, TX
D.B. ~ Paramus, NJ
S.B. ~ Rock Hill, SC
D.B. ~ Mechanicsburg, PA
T.B. ~ Baton Rouge, LA
M.B. ~ Houston, TX
A.B. ~ Cheltenham, PA
A.C. ~ Gulf Shores, AL
S.C. ~ Carrollton, GA
M.C. ~ Missouri City, TX
T.C. ~ Winterville, NC
T.C. ~ Mundelein, IL
K.C. ~ Yuba City, CA
M.C. ~ San Antonio, TX
P.C. ~ Yuba City, CA
D.C. ~ La Crescenta, CA
C.C. ~ Troy, MO
T.C. ~ Mt. Pleasant, NC
N.C. ~ Miamisburg, OH
J.C. ~ Whitehall, PA
M.C. ~ Boardman, OH
T.C. ~ Peachtree City, GA
L.C. ~ Orangevale, CA
N.C. ~ LaPlace, LA
N.C. ~ New Hope, PA
J.C. ~ Baton Rouge, LA
S.C. ~ Farmington, PA

A.C. ~ Marysville, CA
B.C. ~ Wyncote, PA
L.C. ~ Dugspur, VA
P.C. ~ Washington, NJ
F.C. ~ Plainsboro, NJ
D.D. ~ Westmont, IL
C.D. ~ Moscow, PA
E.D. ~ Lewisville, TX
G.D. ~ Houston, TX
S.D. ~ Brooklyn, NY
J.D. ~ Hillsborough, NJ
P.D. ~ San Antonio, TX
J.D. ~ Selma, AL
E.D. ~ Bound Brook, NJ
D.D. ~ Marysville, CA
H.D. ~ Edmonds, WA
S.D. ~ Camp Wood, TX
T.D. ~ Orlando, FL
L.E. ~ Fond du Lac, WI
T.E. ~ Baton Rouge, LA
D.E. ~ Sardis, GA
B.E. ~ Lincoln, MT
S.E. ~ Manalapan, NJ
S.F. ~ Keasbey, NJ
L.F. ~ Ft. Washington, MD
B.F. ~ Myrtle Beach, SC
C.F. ~ Durango, CO
A.F. ~ Edison, NJ
S.F. ~ Lewisville, TX
M.F. ~ Belle Mead, NJ
K.G. ~ Aptos, CA
V.G. ~ San Antonio, TX
R.G. ~ Blakesburg, IA
R.G. ~ New Port Richey, FL
J.G. ~ Cabot, AR
C.G. ~ Yulee, FL
F.G. ~ Norcross, GA

G.G. ~ Hempstead, TX
J.J. ~ San Antonio, TX
L.J. ~ Marysville, CA
M.J. ~ Graniteville, SC
S.J. ~ Whitehouse, OH
D.K. ~ Alpharetta, GA
K.K. ~ Weatherford, OK
A.K. ~ Naples, FL
K.K. ~ Carleton, MI
A.K. ~ Beverly Hills, FL
L.K. ~ Wayne, NJ
D.K. ~ Plainsboro, NJ
H.K. ~ Wheeling, WV
J.K. ~ Bourbonnais, IL
M.L. ~ Somerville, NJ
C.L. ~ Trenton, SC
E.L. ~ Marshall, AR
V.L. ~ Weirton, WV
K.L. ~ Kendall Park, NJ
M.L. ~ Silver Spring, MD
B.L. ~ Camas, WA
D.L. ~ Norfolk, VA
R.L. ~ Dixon, CA
R.L. ~ Huntington Beach, CA
T.L. ~ Ogden, UT
P.L. ~ West Chester, PA
C.M. ~ Highland Park, NJ
T.M. ~ Kings Park, NY
J.M. ~ Iselin, NJ
C.M. ~ San Antonio, TX
K.M. ~ Yuba City, CA
D.M. ~ San Antonio, TX
C.M. ~ Loganville, GA
R.M. ~ Jackson, TN
L.M. ~ San Antonio, TX
J.M. ~ San Antonio, TX
M.M. ~ Somerset, NJ
L.M. ~ Sugar Hill, GA

H.M. ~ Catonsville, MD
A.M. ~ Boulder, CO
T.M. ~ Lockhart, TX
D.M. ~ Interlochen, MI
B.M. ~ Green Forest, AR
A.M. ~ Guttenberg, NJ
B.M. ~ Centennial, CO
S.M. ~ Martinez, GA
L.M. ~ Olivehurst, CA
S.M. ~ Santa Cruz, CA
D.M. ~ San Antonio, TX
M.M. ~ Sandia Park, NM
T.N. ~ Eau Claire, WI
J.N. ~ Silt, CO
S.N. ~ Baton Rouge, LA
M.N. ~ Winfield, IL
L.N. ~ Lansing, IL
S.N. ~ Olathe, KS
L.N. ~ Robbinsdale, MN
T.O. ~ Sugarland, TX
J.O. ~ Mendon, OH
S.O. ~ Summerville, SC
C.O. ~ Las Vegas, NV
L.P. ~ Washington, NJ
K.P. ~ San Antonio, TX
S.P. ~ Sunnyside, WA
D.P. ~ Columbia, SC
R.P. ~ Pompano Beach, FL
L.P. ~ Harpers Ferry, WV
M.P. ~ Newark(Summer Hill), DE
B.P. ~ Yuba City, CA
J.P. ~ Houma, LA
J.P. ~ Jay, ME
S.P. ~ Hermitage, MO
D.P. ~ Titusville, FL
P.P. ~ Shepherdsville, KY
T.P. ~ Costa Mesa, CA
D.Q. ~ Collierville, TN

C.R. ~ Fort Lauderdale, FL
K.R. ~ Stevensville, MT
B.R. ~ Jersey City, NJ
R.R. ~ Wharton, TX
T.R. ~ Eldora, IL
G.R. ~ Wrentham, MA
G.R. ~ So. Whitley, IN
C.R. ~ San Antonio, TX
K.R. ~ Beech Bluff, TN
E.R. ~ Scotia, NY
K.S. ~ Lebanon, NJ
J.S. ~ Owens Cross Roads, AL
R.S. ~ Charlotte, MI
D.S. ~ Pompano Beach, FL
P.S. ~ Highland Village, TX
K.S. ~ Berlin, PA
L.S. ~ Yonkers, NY
J.S. ~ Opelika, AL
L.S. ~ Yuba City, CA
K.S ~ Dubuque, IA
A.S. ~ Lake Forest, CA
L.S. ~ Palm Springs, FL
S.S. ~ Kearney, MO
S.S. ~ Gilbert, AZ
L.S. ~ Gradyville, PA
H.S. ~ St. Pete, FL
M.S. ~ Charlotte, MI
J.S. ~ Bryn Mawr, PA
L.T. ~ Ridley Park, PA
N.T. ~ Rockton, IL
F.T. ~ San Antonio, TX
M.T. ~ Onsted, MI
E.T. ~ Ridley Park, PA
L.T. ~ Sioux City, IA
A.T. ~ Saint Jo, TX
E.T. ~ Largo, FL
S.T. ~ Washington, DC
P.T. ~ Bellbrook, OH

R.T. ~ Newhall, CA
C.T. ~ Lancaster, OH
D.V. ~ St. Louis, MO
J.V. ~ Washington, MI
L.V. ~ Mill Creek, IN
P.V. ~ Jacksonville, FL
J.W. ~ Bayfield, CO
N.W. ~ Dublin, CA
N.W. ~ Orange, CA
S.W. ~ Champaign, IL
N.W. ~ Canyon Lake, TX
R.W. ~ Mansfield, OH
G.W. ~ Albequerque, NM
R.W. ~ Ashland, OH
E.W. ~ Gainesville, GA
L.W. ~ Maysville, GA
M.W. ~ Rockwall, TX
R.W. ~ Ponte Vedra Beach, FL
T.W. ~ Sanger, TX
L.Y. ~ Rahway, NJ
M.Y. ~ Van Nuys, CA
J.Z. ~ Bridgewater, NJ